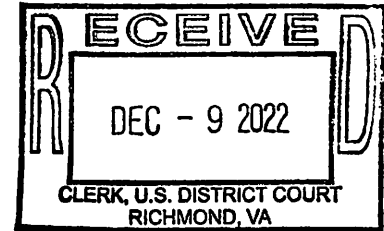


12/06/2022

Clerk of United States District Court
Eastern District of Virginia
701 East Broad Street
Richmond VA 23219



USPS Priority mail: 9405 5118 9956 2340 6909 03

Re: Petition to the Court to Compel Compliance Relating to Document 97 "Letter received from John Hilliard Jr." for case: Haney, et al. v. Genworth Life Insurance Company, et al., Case No. 3:22-cv-00055-REP

Honorable Judge Payne:

Although the hearing has already been completed, new information was presented in the hearing that affected and strengthened my objection (documents 35 and 58) to class counsel attorney fees requested and also, indirectly but significantly, draws into question the efforts put forth by Counsel for Defendants and Counsel for Plaintiffs when creating remedies for class members.

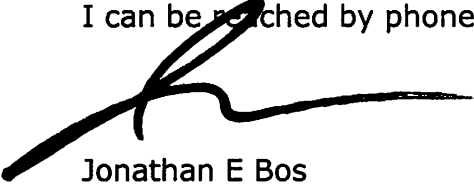
John Hilliard Jr was identified in the hearing as a possible class member who had been overlooked. Mr. Hilliard asked for confirmation of his status as an overlooked class member and posed the question, "How many other eligible policyholders are unaware as we would have been without our agent's information?" (regarding status as a class member).

Counsel for Defendants and Counsel for Plaintiffs jointly submitted document 95 "NOTICE by Genworth Life Insurance Company, Genworth Life Insurance Company of New York Joint Notice Regarding Class Member John Hilliard". The letter confirmed John Hilliard Jr as a class member and consented to him making further statements during the Final Approval hearing scheduled for December 13. However, the document avoided answering Mr. Hilliard's important question ["How many other eligible policyholders are unaware as we would have been without our agent's information?" (regarding status as a class member)]. Furthermore, the document also ignored questions about the number of likewise omitted class members from the 2 previous serial cases against Genworth (These cases are referenced in my timely submitted objection).

Because this newly introduced information improves the strength of my objection, and possibly the objections of others, I petition you to allow myself and others follow-up comments at the Final Approval hearing. I further petition you to instruct Counsel for Defendants and Counsel for Plaintiffs to submit a report detailing the number of class members incorrectly omitted for this case and the 2 other preceding serial cases, as well as an analysis of causes for the omissions.

If these items are not addressed by the December 13 scheduled hearing date, I request that the hearing be postponed, or that these requests be preserved in the Court's records so that they may be addressed in Appeal, if necessary.

I thank you for your careful consideration. In the interest of expediting a response, I can be reached by phone at 325-262-9757 or by fax at 325-284-3980.



Jonathan E Bos
701 Washington Blvd
Abilene TX 79601

Copy served to:
Haney v. Genworth
Objections
P.O. Box 2860
Portland OR 97208-2860
USPS Priority Mail: 9405 5118 9956 2340 6905 90

Copy served to:
Genworth Life Insurance Company
attn Michael Duvall
c/o Dentons US LLP
1221 AVENUE OF THE AMERICAS LBBY 1
NEW YORK NY 10020-1001
USPS Priority Mail: 9405 5118 9956 2340 6226 21